



*State of New Jersey*

Chris Christie  
*Governor*

Office of the Attorney General  
Department of Law and Public Safety  
Division of Gaming Enforcement  
1300 Atlantic Avenue  
Atlantic City, NJ 08401

Jeffrey S. Chiesa  
*Attorney General*

Kim Guadagno  
*Lt. Governor*

David Rebuck  
*Director*

June 8, 2012

Michael A. Magazzu, Esquire  
Corporate Counsel  
Caesars Entertainment, Eastern Division  
c/o Bally's Atlantic City  
Park Place and The Boardwalk  
Atlantic City, New Jersey 08401

RE: Petition #1601203

Dear Mr. Magazzu:

The staff of the Division of Gaming Enforcement's (Division) Regulatory Enforcement Bureau reviewed Petition #1581201 filed by Harrah's Atlantic City Operating Company, d/b/a/ Harrah's Resort Atlantic City (Harrah's), dated June 6, 2012. On June 8, 2012, Harrah's filed notice to the Division of Gaming Enforcement withdrawing said petition. On June 8, 2012, the Division of Gaming Enforcement received a new Petition #1601203 filed by Harrah's seeking approval to amend it's Certificate of Operation and Casino Hotel Alcoholic Beverage (CHAB) License.

Harrah's casino is currently operating under a Certificate of Operation which was approved in Petition #1441201 on May 30, 2012, by the Division of Gaming Enforcement.

By Petition #1601203 Harrah's seeks approval to implement four (4) alternate layouts to approved petition #1441201, converting Ballrooms A, B, C, D and the Brigantine Room from non-gaming space to temporary gaming space for poker tournaments, as depicted on the architectural drawing labeled PCO-61R3, dated June 4, 2012, which were prepared and certified by Michael Demling, RA, License #08676, of Michael Demling Associates (Exhibit A).



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**The petitioner proposes the following:**

1. Provide 4 alternate layouts (plans) to convert Ballrooms A, B, C, D and the Brigantine Room from non-gaming space to temporary gaming space. This will be for the purpose of conducting poker tournaments.

**The summary of the statistical calculations is as follows:**

1. No change to the number of slot machines or slot stools. The total number of slot machines remains at **2,666** and the total number of slot stools is **2,666**.
2. The **base number** of total approved table games is **175**.

**When the petitioner provides notice:**

- A. **Alternate Layout #1** will utilize the **Brigantine Room** and **Ballrooms A, B, C and D**. As a result of this implementation, the total number of table games will **temporarily** increase to **258**.
  - B. **Alternate Layout #2** will utilize **Ballrooms A, B, C, and D**. As a result of this implementation, the total number of table games will **temporarily** increase to **232**.
  - C. **Alternate Layout #3** will utilize the **Brigantine Room and Ballroom A**. As a result of this implementation, the total number of table games will **temporarily** increase to **217**.
  - D. **Alternate Layout #4** will utilize the **Brigantine Room**. As a result of this implementation the total number of table games will **temporarily** increase to **205**.
3. The casino floor area is one hundred fifty-eight thousand nine hundred sixty-six (**158,966**) square feet. The Simulcast is five hundred sixty-nine (**569**) square feet. The **total base gaming area** is one hundred fifty- nine thousand five hundred thirty-five (**159,535**) square feet.

- A. **Alternate Layout #1** will temporarily add **17,031** square feet, for a total gaming area of **176,566** square feet.
  - B. **Alternate Layout #2** will temporarily add **12,699** square feet for a total gaming area of **172,234** square feet.
  - C. **Alternate Layout #3** will temporarily add **7,329** square feet for a total gaming area of **166,864** square feet.
  - D. **Alternate Layout #4** will temporarily add **4,332** square feet for a total gaming area of **163,867** square feet.
4. A. When **Alternate Layout #1** is implemented, the allowable slot coverage is **158,909** square feet.
- B. When **Alternate Layout #2** is implemented, the allowable slot coverage is **155,011** square feet.
- C. When **Alternate Layout #3** is implemented, the allowable slot coverage is **150,178** square feet.
- D. When **Alternate Layout #4** is implemented, the allowable slot coverage is **147,480** square feet.
5. The actual **base slot coverage** is one hundred two thousand six hundred sixty-two (**102,662**) square feet which is **64%** of the total gaming area and within the allowable 90% for slot density.
- A. When **Alternate Layout #1** is implemented, the actual slot coverage is **102,662** square feet which is **58%** of the total gaming area and within the allowable 90% for slot density.
- B. When **Alternate Layout #2** is implemented, the actual slot coverage is **102,662** square feet which is **60%** of the total gaming area and within the allowable 90% for slot density.
- C. When **Alternate Layout #3** is implemented, the actual slot coverage is **102,662** square feet which is **62%** of the total gaming area and within the allowable 90% for slot density.

- D. When **Alternate Layout #4** is implemented, the actual slot coverage is **102,662** square feet which is **63%** of the total gaming area and within the allowable 90% for slot density.

Based on the Division's authority, the requested amendments to Harrah's Certificate of Operation and CHAB license, as set forth above, are hereby granted pursuant to N.J.A.C. 13:69C-7.1, et seq. This approval authorizes a casino room containing and consisting of:

- A. **Alternate Layout #1** - **176,566** square feet of total gaming space, **258** table games, and **2,666** slot machines and slot stools.
- B. **Alternate Layout #2** - **172,234** square feet of total gaming space, **232** table games, and **2,666** slot machines and slot stools.
- C. **Alternate Layout #3** - **166,864** square feet of total gaming space, **217** table games, and **2,666** slot machines and slot stools.
- D. **Alternate Layout #4** - **163,867** square feet of total gaming space, **205** table games, and **2,666** slot machines and slot stools.

Since the casino floor area has been increased, smoking areas should be changed accordingly. Please note that the designation of smoking areas in casinos is subject to the jurisdiction of the N.J. Department of Health and Senior Services and the Atlantic City Department of Health and Human Services, not the Division. Accordingly, this letter should in no way be construed as approving areas of the gaming floor for smoking.

**This approval is subject to the following conditions:**

- A. That revised operational blueprints, reflecting the changes approved herein, be submitted to the Division's Regulatory Enforcement Bureau, casino licensee's security podium and the casino licensee's CCTV monitoring room;
- B. That a revised Table Game inventory list is submitted to the in-house Division office;
- C. That Harrah's notifies the Division immediately in the event of any modification to the approvals granted herein;
- D. That Harrah's complies with CCTV requirements, identified in N.J.A.C. 13:69D-1.10, regarding the requirements to record all gaming tables whether active or inactive;
- E. That all events capable of being monitored must be accessible from the Division's CCTV monitoring system as required by N.J.A.C. 13:69D-1.10(a)3;
- F. That all steps are taken to ensure maximum patron comfort and safety during the period of renovation;
- G. That Harrah's complies with all requirements and conditions appended to approvals received from all involved agencies of government whose approvals are required in order for a Certificate of Occupancy for the general public to be issued including, but not limited to, the Department of Community Affairs and the local construction official;
- H. That Harrah's request to use the Brigantine Room and Ballrooms A, B, C, and D, currently licensed as a CHAB Type II location to be temporarily licensed as a CHAB Type I location, will be subject to approval granted by an order from the Division of Gaming Enforcement. This matter will be addressed in a separate approval order from the Division's Regulatory Prosecution Bureau;
- I. In the future, if there are no changes from this approved petition, only notification of which alternate layout is being implemented, along with certifications is required. Notification must be submitted at least three (3) business days in advance of the poker tournament; and,
- J. That Harrah's will employ one additional Surveillance Operator for each shift during operation of the tournament as required by N.J.A.C. 13:39D-1.10(k)1.

Michael Magazzu, Esquire  
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If you have any questions, please do not hesitate to contact Bill Kendzierski of my staff at 441-7557.

Sincerely,

DON ERRERA / by WJ/K

Don Errera, Deputy Chief  
Regulatory Enforcement Bureau

RSH/DE

CC: Chuck Kimmel, DGE  
Lisa Spengler, DGE  
DGE Intake Unit  
C-12-12-022